

REMARKS

In view of the amendments proposed above, Applicant respectfully requests consideration of the following remarks.

Objection to Specification

The Examiner objected to the specification due to informalities. Specifically, the Examiner noted that on page 7, line 5, the word "of" was omitted. Office Action, at page 2. This portion of the specification has been amended herein to correct this informality.

Objection to Claim 16

The Examiner objected to claim 16 due to informalities, indicating that claim 16 is identical to claim 10. Office Action, at page 2. Claim 16 is amended herein to recite the proper dependency, which Applicant believes will address the Examiner's objection.

Anticipation Rejections Under 35 U.S.C. § 102

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Anticipation Rejection Based on United States Patent 6,088,229 to Seto et al.

Claims 1, 2, 4-6, 8, and 9 were rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent 6,088,229 to Seto et al. (hereinafter "Seto").

Applicant respectfully traverses this rejection as set forth below.

Seto discloses a computer 1 having a housing 4. Column 7, Lines 13-30; FIG. 1. The housing 4 includes a first receptacle 20 having an insertion hole 24 for receiving one or more PC cards 22, as well as a second receptacle 21 for receiving a CD-ROM drive, a floppy disk drive, and the like. Column 7, Lines 53 through Column 8, Line 7; Column 8, Lines 8-12; FIGS. 2-5. The first receptacle 20 includes a hinged card cover 27 that, when shut, closes the insertion hole 24 of the first receptacle 20. Column 8, Lines 13-20. The housing 4 also has a lock hole 31 for receiving the hook 36 of a locking device 32. Column 8, Lines 46-62.

The computer 1 further includes a lock member 40 disposed within housing 4 and comprising a flat plate-shaped member that is slidably supported by a holder 43 on housing 4. Column 9, Lines 6-21; FIGS. 2-5. The lock member 40 has an engaging portion 42 having a height that is "greater than the thickness dimension of the PC card 22." Column 9, Lines 11-15. The lock member 40 is movable between a "locked position" where the engaging portion 42 advances into the first receptacle 20 and a "lock release position" where the engagement portion 42 retreats from the first receptacle. Column 9, Lines 22-29. The lock member 40 also includes a first engaging hole 48 and a second engaging hole 49 space apart from one another, each engaging hole 48, 49 having a shape to receive the hook 36 of locking device 32. Column 9, Lines 37-44. When the lock member 40 is in the "locked position", the first engaging hole 48 is congruent with

the lock hole 31 on housing 4, and when the lock member 40 is in the "lock release position", the second engaging hole 49 is congruent with the lock hole 31. Column 9, Lines 45-50; FIGS. 3 and 4. As stated in Seto (at Column 10, Lines 15-27):

In the state in which the PC cards 22 are put in the first receptacle 20, if the lock metal member 40 is slid from the lock release position to the lock position, the engaging portion 42 of lock metal member 40 advances to the first receptacle 20, as shown in FIGS. 3 and 5, and projects into the first insertion hole 24. Thus, the engaging portion 42 faces the end portions 22a of PC cards 22 put in the first receptacle 20 and shuts off the passage for ejection of the PC cards 22. As a result, the PC cards 22 are prohibited from being ejected from the first receptacle 20. It is therefore possible to prevent the PC cards 22 from being unintentionally taken out of the first receptacle 20.

In summary, Seto discloses a lock member 40 having an engaging portion 42 that, when held in a locked position by a locking device 32, blocks the removal of one or more PC cards 22. However, the lock member 40 does not engage or otherwise prevent movement of the card cover 27. This is illustrated in FIGS. 2 and 5 of Seto, where the engagement portion 42 of lock member 40 is shown blocking removal of the PC cards 22, **but the card cover 27 is fully open** (shown in a laid down position).

In contrast to Seto, the present claimed invention is directed to an apparatus for securing an access door on a housing. For example, claim 1 recites:

1. An apparatus comprising:
a housing having an access door, the access door movable between a closed position and an open position;
a slot extending through the housing, the slot sized and located to receive a lock head of a locking device when the lock head exhibits a first orientation

and to retain the lock head when the lock head exhibits a second orientation; and
a latch assembly disposed in the housing to maintain the access d or in the closed position when the lock head exhibits the second orientation.

Further, claim 4 recites:

4. An apparatus comprising:

a housing including an access door, the access door movable between a closed position and an open position;
a slot extending through the housing, the slot sized and located to receive a lock head of a locking device when the lock head exhibits a first orientation and to retain the lock head when the lock head exhibits a second orientation;
a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position, the latch movable to a second position wherein the latch disengages the access door to enable the access door to move toward the open position; and
a stop element disposed on the latch, the stop element to engage the lock head and to maintain the latch in the first position when the lock head exhibits the second orientation.

With regard to claim 1, Seto fails to disclose at least the limitations of “a latch assembly disposed in the housing to maintain the access door in the closed position when the lock head exhibits the second orientation.” As to claim 4, Seto similarly fails to disclose at least the limitations of “a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position.”

The Examiner states that Seto discloses a “retaining element 42 to maintain the door 27 in its closed position.” Office Action, at page 2. However, the Examiner’s assertion is, respectfully, unsupported by Seto, as this reference simply does not disclose

a lock member 40 having an engagement portion 42 that engages the card cover 27.

Again, the engagement portion 42 block removal of PC cards 22.

Accordingly, as Seto fails to disclose at least the above-noted limitations of each of independent claims 1 and 4, each of these claims in novel in view of Seto. Further, claim 2 is allowable as depending from novel, independent claim 1, and claims 5, 6, 8, and 9 are allowable as depending from novel, independent claim 4.

Obviousness Rejections Under 35 U.S.C. § 103

To reject a claim or claims under 35 U.S.C. § 103, the Examiner bears the initial burden of establishing a *prima facie* case of obviousness. M.P.E.P. § 2142. When establishing a *prima facie* case of obviousness, the Examiner must set forth evidence showing that the following three criteria are satisfied:

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references (or references when combined) must teach or suggest all the claim limitations.

M.P.E.P. § 2143.

The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on the applicant's disclosure. M.P.E.P. § 2142 (citing *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991)). Also, the evidentiary showing of a motivation or suggestion to combine prior art references "must be clear and particular." *In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999).

Obviousness Rejection Based on United States Patent 6,088,229 to Seto et al. in View of
United States Patent 5,526,227 to Satou et al. or in View of United States Patent
6,144,360 to Evanicky et al.

Claims 3, 11, 12, 14, and 15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Seto in view of United States Patent 5,526,227 to Satou et al. (hereinafter “Satou”) or in view of United States Patent 6,144,360 to Evanicky et al. (hereinafter “Evanicky”). Applicant respectfully traverses this rejection as set forth below.

Claim 3

Claim 3 depends from claim 1. As noted above, Seto fails to disclose at least the following limitations of claim 1: “a latch assembly disposed in the housing to maintain the access door in the closed position when the lock head exhibits the second orientation.” Neither Satou or Evanicky disclose such a limitations. Thus, as Seto, Satou, and Evanicky, either individually or in combination, fail to disclose at least the above-noted limitations of independent claim 1, claim 1 is nonobvious in view of these references. If an independent claim is nonobvious, then any claim depending from the independent claim is also nonobvious. M.P.E.P. §2143.03 (citing *In re Fine*, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988)). Therefore, claim 3 is allowable as depending from nonobvious, independent claim 1.

Claims 11, 12, 14, and 15

Independent claim 11 recites:

11. A projector comprising:
a housing including an access door, the access door movable between a closed position and an open position;
a lamp assembly disposed within the housing adjacent the access door;
a slot extending through the housing, the slot sized and located to receive a lock head of a locking device when the lock head exhibits a first orientation and to retain the lock head when the lock head exhibits a second orientation;
a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position, the latch movable to a second position wherein the latch disengages the access door to enable the access door to move toward the open position; and
a stop element disposed on the latch, the stop element to engage the lock head and to maintain the latch in the first position when the lock head exhibits the second orientation.

As noted above, Seto fails to disclose at least the limitations of "a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position." Both of Satou and Evanicky also fail to disclose these limitations.

Therefore, as Seto, Satou, and Evanicky, either individually or in combination, fail to disclose at least the above-noted limitations of independent claim 11, claim 11 is nonobvious in view of these references. Also, if an independent claim is nonobvious, then any claim depending from the independent claim is also nonobvious. M.P.E.P. §2143.03 (citing *In re Fine*, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988)). Therefore, claims 12, 14, and 15 are each allowable as depending from nonobvious, independent claim 1.

Obviousness Rejection Based on United States Patent 6,088,229 to Seto et al. in View of
United States Patent 4,627,589 to Hotsumi

Claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Seto in view of United States Patent 4,627,589 to Hotsumi (hereinafter "Hotsumi"). Applicant respectfully traverses this rejection as set forth below.

Claim 7 depends from independent claim 4. As noted above, Seto fails to disclose at least the following limitations of claim 4: "a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position." Hotsumi also fails to disclose such limitations. Thus, as Seto and Hotsumi, either individually or in combination, fail to disclose at least the above-noted limitations of independent claim 4, claim 4 is nonobvious in view of these references. If an independent claim is nonobvious, then any claim depending from the independent claim is also nonobvious. M.P.E.P. §2143.03 (citing *In re Fine*, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988)). Therefore, claim 7 is allowable as depending from nonobvious, independent claim 4.

Obviousness Rejection Based on United States Patent 6,088,229 to Seto et al. in View of
United States Patent 6,095,574 to Dean

Claims 10 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Seto in view of United States Patent 6,095,574 to Dean (hereinafter "Dean"). Applicant respectfully traverses this rejection as set forth below.

Claim 10

Claim 10 depends from independent claim 4. As noted above, Seto fails to disclose at least the following limitations of claim 4: "a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position." Dean also fails to disclose these limitations. Accordingly, as Seto and Dean, either individually or in combination, fail to disclose at least the above-noted limitations of independent claim 4, claim 4 is nonobvious in view of these references. If an independent claim is nonobvious, then any claim depending from the independent claim is also nonobvious. M.P.E.P. §2143.03 (citing *In re Fine*, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988)). Therefore, claim 10 is allowable as depending from nonobvious, independent claim 4.

Claim 16

Claim 16 depends from independent claim 11. As noted above, Seto fails to disclose at least the following limitations of claim 11: "a latch to engage the access door and maintain the access door in the closed position when the latch is at a first position." Dean also fails to disclose these limitations. Therefore, as Seto and Dean, either individually or in combination, fail to disclose at least the above-noted limitations of independent claim 11, claim 11 is nonobvious in view of these references. If an independent claim is nonobvious, then any claim depending from the independent claim is also nonobvious. M.P.E.P. §2143.03 (citing *In re Fine*, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988)). Therefore, claim 16 is allowable as depending from nonobvious, independent claim 11.

CONCLUSION

Applicant submits that claims 1-16 are in condition for allowance and respectfully requests allowance of such claims.

Please charge any shortages and credit any overages to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, L.L.P.

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Kerry D. Tweet
Registration No. 45,959

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, CA 90025
(503) 684-6200

KDT/acf